

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **Toyota Industries Compressor Parts America, Co.**

City: Pendergrass

County: Jackson

AIRS #: 04-13-157-00057

Application #: 616750

Date Title V Application Received: January 11, 2022

Permit No: 3585-157-0057-V-03-2

Program	Review Engineers	Review Managers
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Permitting Program Manager		Heather Brown

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the proposed permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Existing Permits**

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
3585-157-0057-V-03-0	January 20, 2021	Title V Renewal
3585-157-0057-V-03-1	April 30, 2021	Administrative Amendment

B. Regulatory Status**1. PSD/NSR/RACT**

Toyota Industries Compressor Parts America Co. (hereinafter “facility”) is in Jackson County, which is an attainment area for all criteria pollutants. Because the site is not one of the 28 named source categories under Prevention of Significant Deterioration (PSD) regulations, and emissions of all criteria air pollutants are under 250 tons per year (tpy), the facility is a minor source with respect to PSD regulations.

Jackson County is not one of the counties listed in GA Rules (tt) and (yy). Therefore, no RACT requirements would apply.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	yes			✓
PM ₁₀	yes			✓
PM _{2.5}	yes			✓
SO ₂	yes			✓
VOC	yes			✓
NO _x	yes			✓
CO	yes			✓
TRS	n/a			
H ₂ S	n/a			
Individual HAP	yes			✓
Total HAPs	yes	✓		

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Total GHGs	yes			✓
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II. Proposed Modification

A. Description of Modification

The Loss on Ignition (LOI) excursion threshold is being modified. The threshold will be 150% of the maximum LOI level measured during the most recent performance test if that test result shows that volatile organic hazardous air pollutants (VOHAP) are less than 2 parts per million by volume dry (ppmvd). Otherwise, the threshold will be 115% of the maximum LOI level measured during the performance test. The LOI excursion notification requirements are also being modified.

The facility also requested that they be allowed to notify EPD via email (as an additional option to oral notification) within 24 hours of discovery of any exceedance per Condition 6.2.26.

B. Emissions Change

Table 3: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	yes	0	0
PM ₁₀	yes	0	0
PM _{2.5}	yes	0	0
SO ₂	yes	0	0
VOC	yes	0	0
NO _x	yes	0	0
CO	yes	0	0
TRS	no	0	0
H ₂ S	no	0	0
Individual HAP	yes	0	0
Total HAPs	yes	0	0
Total GHGs	yes	0	0

C. PSD/NSR Applicability

As discussed previously in Section I B, the facility is located in Jackson County and is a minor source under PSD regulations before the modification. Note that the facility-wide 100-tpy VOC limit will remain unchanged after the modification; therefore, the facility will remain a minor source after the proposed modification. The modification will not trigger any PSD review.

III. Other Record Keeping and Reporting Requirements

Condition 6.1.7.c.v has been modified to specify that excursion reporting is required when the LOI is 115% of the maximum LOI level recorded during the most recent performance test if the most recent performance test shows that VOHAP are equal to or greater than 2 ppmvd.

Condition 6.1.7.c.vi has been added to specify that that excursion reporting is required when the LOI is 150% of the maximum LOI level recorded during the most recent performance test if the most recent performance test shows that VOHAP are less than 2 ppmvd.

The facility explained that, if the most recent performance test result is less than 2 ppmvd, which is 10% of the VOHAP emission limit specified in Condition 3.3.5, reporting the excursion when any monthly LOI measured above 115% of the maximum LOI level recorded in that test may not meet the purpose of excursion reporting because its VOHAP may still be well below the 20-ppmvd standard. In this scenario, the facility requested to raise the excursion threshold to 150% of the maximum LOI level recorded during the most recent performance test. The Division approves the facility's request and modifies Condition 6.1.7c.v. accordingly.

Condition 6.2.26 has been modified to allow the facility to report any exceedance of the LOI level above the performance test based operating limit via email within 24 hours of discovery and in writing (hard copy) within 7 days of discovery.

Addendum to Narrative

The 45-day EPA review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//